

February 1, 2012

EX PARTE

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Proposed Extension of Part 4 of the Commission's Rules

Regarding Outage Reporting, PS Docket No. 11-82

Dear Ms. Dortch:

This is to inform you that on January 30, 2012, Melissa Newman of CenturyLink, Nneka Ezenwa and Mark Montagno of Verizon, and the undersigned representing USTelecom, held a meeting with Angela Giancarlo, Legal Advisor to Commissioner McDowell, in connection with the proceeding identified above. Consistent with our prior advocacy in this proceeding, we urged that the Commission ensure that any reporting requirements that might be adopted are closely aligned with the Commission's stated public policy goal of ensuring that consumers have access to emergency services. In order to accomplish this goal, the Commission should limit any reporting obligations to outages affecting a company's own 911 facility or involving a complete loss of its interconnected VoIP service that has an actual impact on customers' ability to reach emergency services. We also explained that proposals concerning reporting by broadband Internet access service providers and Internet backbone service providers were not supported by the record in this proceeding, were outside the Commission's legal authority and would impose major burdens on providers.

Please include this notice in the record of the proceeding identified above.

Sincerely,

Glenn Reynolds

Dem Ryndels -

c: Angela Giancarlo